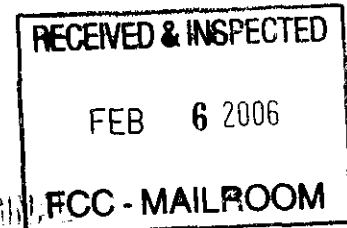




February 3, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554



DOCKET FILE COPY ORIGINAL

Re: **EB Docket No. 06-36, Certification of CPNI Filing 2006**  
**EB-06-TC-060**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB Docket No. 06-36.

**Company Names:** Golden West Telecommunications Coop. Inc. (499 Filer ID 801096)  
Vivian Telephone Company (499 Filer ID 807300)  
Sioux Valley Telephone Company (499 Filer ID 802050)  
Union Telephone Company (499 Filer ID 801879)  
Kadoka Telephone Company (499 Filer ID 803286)  
Armour Independent Telephone Company (499 Filer ID 801882)  
Bridgewater-Canistota Ind. Telephone Co. (499 Filer ID 801881)  
Golden West Technologies (499 Filer ID 811483)

**Address** 415 Crown Street, PO Box 411

**City, State** Wall, SD 57790

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

  
George Strandell  
President/CEO

Dated: February 3, 2006

No. of Copies rec'd 0+4  
List ABCDE

Attachment

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington, DC 20554

Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Washington, DC 20554

**Golden West Telecommunications Cooperative, Inc. 499 Filer ID 801096**

**Golden West Telecommunications Cooperative, Inc. Subsidiaries**

**Armour Independent Telephone Co. 499 Filer ID 801882**

**Bridgewater-Canistota Independent Tel. Co. 499 Filer ID 801881**

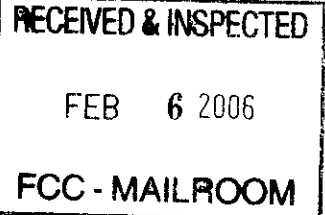
**Golden West Technologies 499 Filer ID 811483**

**Kadoka Tel. Co. 499 Filer ID 803286**

**Sioux Valley Tel. Co. 499 Filer ID 802050**

**Union Tel. Co. 499 Filer ID 801879**

**Vivian Tel. Co. 499 Filer ID 807300**



415 Crown St., P.O. Box 411, Wall, SD 57790 (605) 279-2161

## **STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Golden West Telecommunications Cooperative, Inc. and its subsidiary telecommunications carriers listed above (collectively "the Company" or "Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

### **1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Part 64, Subpart U, Section 64.2003(d) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

### **2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

### **3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

**6. Record of Customer CPNI Approval/Non-Approval**

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

**7. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

**8. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.



George Strandell, General Manager/CEO  
Golden West Telecommunications Cooperative, Inc.  
Armour Independent Telephone Co.  
Bridgewater-Canistota Independent Tel. Co.  
Golden West Technologies  
Kadoka Tel. Co.  
Sioux Valley Tel. Co.  
Union Tel. Co.  
Vivian Tel. Co.  
February 3, 2006